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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA, Plaintiff, vs. ABNER J. THOMPSON, JR., Defendant.	Case No.: 2:14-cr-46-APG-CWH **STIPULATION FOR PROTECTIVE ORDER**

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, Sarah E. Griswold and Brian Pugh, Assistant United States Attorneys, counsel for the United States, and James A. Oronoz, counsel for defendant Abner J. Thompson, Jr., that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

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1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including social security numbers, drivers license numbers, dates of birth, and addresses, of participants, witnesses, and victims in this case.

2. Discovery in this case is voluminous. Many of the documents include personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery to defendants.

3. The United States agrees to provide Protected Documents without redacting the personal identifiers of participants, witnesses, and victims.

4. Access to Protected Documents will be restricted to persons authorized by the Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

5. The following restrictions will be placed on defendant, defendant's attorney(s) and the above-designated individuals unless and until further ordered by the Court. Defendants, defendants' attorneys and the above-designated individuals shall not:

a. make copies for, or allow copies of any kind to be made by any other person of Protected Documents;

b. allow any other person to read Protected Documents; and,

c. use Protected Documents for any other purpose other than preparing to defend against the charges in the Superseding Indictment or any further superseding indictment arising out of this case.

6. Defendant's attorney(s) shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

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7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as social security numbers, drivers license numbers, dates of birth, and addresses during the trial of this matter.

8. Upon conclusion of this action, defendant's attorney(s) shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as social security numbers, drivers license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the last appeal is final.

DANIEL G. BOGDEN
United States Attorney

/s/ Sarah E. Griswold — February 26, 2014
SARAH E. GRISWOLD — DATE
BRIAN PUGH
Assistant United States Attorneys

/s/ James A. Oronoz — February 26, 2014
JAMES A. ORONOZ — DATE
Counsel for Abner J. Thompson, Jr.

ORDER

IT IS SO ORDERED this 27th day of February, 2014.

UNITED STATES MAGISTRATE JUDGE